

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

FREE SPEECH SYSTEMS, LLC,  
Debtor.

Bankruptcy Case No. 22-60043

---

SHANNON & LEE LLP,  
Appellant,

Civil Action No. 23-00461

v.

U.S. TRUSTEE  
Appellee.

---

---

**NOTICE OF BANKRUPTCY COURT ORDER APPROVING SETTLEMENT**

---

Pursuant to the Order [Dkt. No. 7] entered by this Court on March 28, 2023, Shannon & Lee LLP (the “Appellant”), provides notice of the following:

1. On April 28, 2023, the U.S. Bankruptcy Court for the Southern District of Texas, entered an order [Bankr. Dkt. No. 579] (the “Bankruptcy Court Order”) granting the Debtor’s Motion for Order Approving Settlement. A copy of the Bankruptcy Court Order is attached hereto as Exhibit A.

2. The deadline for the Appellant to file its principal brief is May 29, 2023.

3. Pursuant to the terms of the settlement approved by the Bankruptcy Court Order, the Appellant anticipates seeking the dismissal of this Appeal upon the Bankruptcy Court Order becoming a final, non-appealable order.

Dated: May 5, 2023

/s/ R. J. Shannon

R. J. Shannon  
S.D. Texas Bar No. 3192614  
Texas Bar No. 24108062  
SHANNON & LEE LLP  
Pennzoil Place  
700 Milam Street, Suite 1300  
Houston, Texas 77002  
Telephone: (713) 714-5770  
Facsimile: (833) 714-5770  
Email: [rshannon@shannonleellp.com](mailto:rshannon@shannonleellp.com)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served through the Court's CM/ECF system on all parties registered to receive such service and by separate email:

Ha Minh Nguyen  
Office of the U.S. Trustee  
515 Rusk Street  
Ste. 3516  
Houston, TX 77002  
[ha.nguyen@usdoj.gov](mailto:ha.nguyen@usdoj.gov)

Beth Ann Levene  
DOJ-Ust  
Executive Office for the U.S. Trustees  
441 G Street, N.W.  
Suite 6150  
Washington, DC 20530  
[beth.a.levene@usdoj.gov](mailto:beth.a.levene@usdoj.gov)

Raymond William Battaglia  
Law Offices of Ray Battaglia, PLLC  
66 Granburg Circle  
San Antonio, TX 78218  
[rbattagliaw@outlook.com](mailto:rbattagliaw@outlook.com)

Christina W Stephenson  
Crowe & Dunlevy, PC  
2525 McKinnon St.  
Suite 425  
Dallas, TX 75201  
[Crissie.Stephenson@crowedunlevy.com](mailto:Crissie.Stephenson@crowedunlevy.com)

Kyung Shik Lee  
4723 B Oakshire Dr  
Houston, TX 77027  
[kslee50@gmail.com](mailto:kslee50@gmail.com)

/s/ R. J. Shannon

**EXHIBIT A**

Bankruptcy Court Order

**ENTERED**

April 28, 2023

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:****FREE SPEECH SYSTEMS, LLC,****DEBTOR.**§  
§  
§  
§  
§  
§**Case No. 22-60043****Chapter 11 (Subchapter V)**

**ORDER GRANTING DEBTOR'S MOTION FOR ORDER APPROVING SETTLEMENT**

The Court, having considered the *Debtor's Motion for Order Approving Settlement* (the "Motion"),<sup>1</sup> any responses to the Motion, the statements of counsel, and the record in this case, finds that: (a) it has jurisdiction over this matter pursuant to 28 U.S.C. § 1334; (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (c) the relief requested in the Motion is in the best interests of the Debtor's estate, its creditors, and other parties-in-interest; (d) proper and adequate notice of the Motion has been given and no other or further notice is necessary; and (e) good and sufficient cause exists to grant the relief requested. Therefore, IT IS HEREBY ORDERED THAT:

1. For the reasons stated on the record at the April 28, 2023 hearing, the Motion is GRANTED as set forth herein.
2. In full satisfaction of any and all claims or rights to payment from the Debtor and its estate, Shannon & Lee LLP ("S&L") shall receive the \$50,822.68 prepetition retainer held by S&L from the Debtor (the "S&L Retainer"). S&L is authorized to take possession of the S&L Retainer upon entry of this Order.
3. In full satisfaction of any and all claims or rights to payment from the Debtor and its estate, Schwartz Associates LLC ("SALLC") shall receive the \$75,000.00 prepetition retainer held by SALLC (the "SALLC Retainer"). SALLC is authorized to take possession of the SALLC Retainer upon entry of this Order.

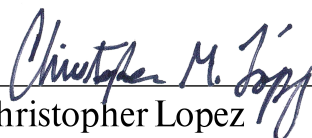
---

<sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

4. The Parties are authorized to take any and all actions necessary and appropriate to implement and carry out the provisions of the Settlement.

5. This Court shall retain exclusive jurisdiction with respect to all matters relating to the interpretation or implementation of this Order or the Settlement Agreement.

Signed: April 28, 2023

  
\_\_\_\_\_  
Christopher Lopez  
United States Bankruptcy Judge